



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

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October 10, 2001

MEMORANDUM

SUBJECT: Safeco Safe Transport
EPA Site ID No. IDD984667469

FROM: Monica Tonel, Superfund Program *Monica Tonel*
Office of Environmental Cleanup (ECL)

Judy Stone, Resource Conservation and Recovery Act Program
Office of Waste & Chemicals Management (WCM) *Judy Stone*

TO: Official CERCLA and RCRA site files

BACKGROUND

On March 31, 1999, the Office of Inspector General (OIG) released an audit report entitled "Superfund Sites Deferred to RCRA," which assessed EPA's implementation of its Resource Conservation and Recovery Act (RCRA) deferral policy. The OIG concluded that a large portion of the sites deferred to RCRA did not meet the deferral criteria and were therefore inappropriately deferred. The above subject site has been identified as one of those "deferred" sites requiring a review of the deferral decision.

PURPOSE

This memorandum is written in reference to the interim guidance provided by EPA Headquarters, OSWER Directive 9200.1-31P, and serves to:

- clarify the current status of the above subject site in both the Superfund and RCRA programs,
- identify the program that will maintain responsibility for the site, and
- clarify any changes to the CERCLIS database resulting from this review.

EPA has conducted a review of available information and determined that the subject site should not be deferred to RCRA. Additionally, no further action by the federal Superfund program is anticipated, at this time. Should new or additional information become available necessitating further Superfund consideration, this site will be reevaluated at that time.

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RCRA program, current status. This site was ranked as a Low Priority corrective action site. No facility investigation was necessary.

SF tracking/CERCLIS database. The action qualifier of 'D' associated with a preliminary assessment (PA) action of 1992 will be changed to 'N' (No Further Remedial Action Planned). The Non-NPL Status value will reflect a "NFRAP" value and the RCRA Deferral Audit Special Initiative Indicator will reflect a "RCRA Deferral-New Decision" value. This memorandum documents the reasons for the change.

Additionally, in accordance with EPA's decision regarding the tracking of sites for which no further work under the federal Superfund program is planned at this time, the subject site was removed from the CERCLIS database and placed in a separate archival data base as a historical record. Archived sites may be returned to the CERCLIS site inventory if new information warranting further Superfund consideration is discovered.